

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

DASHONTA WARREN

Case: 2:21-mj-30079

Judge: Unassigned,

Case No.

Filed: 02-17-2021 At 04:21 PM

USA v. DASHONTA WARREN (CMP)
(MLW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April- June 2020 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:*Code Section*

18 U.S.C § 1344

Offense Description

Bank Fraud

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.Sworn to before me and signed in my presence
and/or by reliable electronic means.Date: February 17, 2021City and state: Detroit, MI
Complainant's signatureMatthew Sluss - Special Agent

Printed name and title


Judge's signatureAnthony P. Patti - U.S Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF A COMPLAINT

I, Matthew Sluss, Special Agent of the Federal Bureau of Investigation (FBI), being duly sworn, state that:

INTRODUCTION AND AGENT BACKGROUND

1. I am an investigative or law enforcement officer of the United States within the meaning of Section 2510(7) of Title 18 of the United States Code. I am empowered to conduct investigations of and to make arrests for offenses enumerated in Title 18 of the United States Code.

2. I have been employed by the FBI as a Special Agent since September 2017. During my employment with the FBI, I have investigated federal crimes including mail fraud, wire fraud, bank fraud, bankruptcy fraud, and various other criminal matters. At all times during the investigation described in this affidavit, I have been acting in an official capacity as a Special Agent of the FBI.

3. This affidavit is made in support of a criminal complaint and summons to appear for DASHONTA WARREN for violating 18 U.S.C. §1344.

4. This affidavit is submitted for the limited purpose of securing a criminal complaint and arrest warrant; therefore, this affidavit does not contain every fact that I have learned during the course of the investigation. I have only set forth the facts necessary to establish probable cause to believe that WARREN violated the statutes identified above. The information contained in this affidavit is based upon my

personal knowledge, training and experience, as well as the combined knowledge, training and experience of other law enforcement officers and agents with whom I have had discussions.

5. 18 U.S.C. §1344 criminalizes schemes or artifices to defraud a financial institution or obtain any moneys, funds, credits, assets, securities, or other property owned by, or under the custody or control of, a financial institution, by means of false or fraudulent pretenses, representations, or promises.

BACKGROUND OF THE PAYCHECK PROTECTION PROGRAM

6. The Coronavirus Aid, Relief, and Economic Security (“CARES”) Act is a federal law enacted in or around March 2020 and designed to provide emergency financial assistance to the millions of Americans who are suffering the economic effects caused by the COVID-19 pandemic. One source of relief provided by the CARES Act was the authorization of up to \$349 billion in forgivable loans to small businesses for job retention and certain other expenses, through a program referred to as the Paycheck Protection Program (“PPP”). In or around April 2020, Congress authorized over \$300 billion in additional PPP funding.

7. In order to obtain a PPP loan, a business must submit a PPP loan application (SBA Form 2483), which is signed by an authorized representative of the business. The PPP loan application requires the business (through its authorized representative) to acknowledge the program rules and to make certain affirmative

certifications regarding its eligibility. In the application, the small business's authorized representative must also provide, among other things, the business's: (a) average monthly payroll expenses; and (b) number of employees. These figures are used to calculate the business's eligibility and the amount of money it may receive under the PPP. In addition, businesses applying for a PPP loan must provide documentation showing their payroll expenses.

8. A PPP loan application must be processed by a participating lending financial institution. If a PPP loan application is approved for funding by the participating financial institution, that institution funds the PPP loan using its own monies, which are 100% guaranteed by the Small Business Administration ("SBA"). Participating financial institutions require that the information provided in PPP loan applications be truthful, including information about the applicant business's employees and payroll expenses, which is material to the financial institutions' approval and the terms of PPP loans.

9. Information from the application, including information about the borrower, the total amount of the loan, and the listed number of employees, is transmitted by the lending financial institution to the SBA in the course of processing the loan.

10. PPP loan proceeds must be used by the business for certain permissible expenses—payroll costs, interest on mortgages, rent, and utilities. The PPP allows the interest and principal on the PPP loan to be entirely forgiven if the business

spends the loan proceeds on these items within a designated period of time (usually within twenty-four weeks of receiving the proceeds) and uses at least 60% of the PPP loan proceeds for payroll expenses.

BACKGROUND OF ECONOMIC INJURY DISASTER LOANS

11. Another component of the CARES Act are SBA Economic Injury Disaster Loans (EIDL). The SBA provides that in response to COVID-19, EIDLs will provide economic relief to small businesses and non-profit organizations that were experiencing a temporary loss of revenue. EIDL proceeds can be used to cover a wide array of working capital and normal operating expenses, such as continuation to health care benefits, rent, utilities, and fixed debt payments.

PROBABLE CAUSE

12. Open source records indicate WARREN is a resident of Dearborn, Michigan.

13. According to records maintained by the Michigan Department of Licensing and Regulatory Affairs (LARA), Dashonta D Warren LLC is a Domestic Limited Liability Company (LLC) with a registered office mailing address of 3800 Greenfield Road in Dearborn, MI 48121 (“3800 Greenfield Address”). Your affiant knows this address to be that of the U.S. Post Office in Dearborn, MI. Dashonta D Warren LLC was organized with LARA in July 2017, and WARREN is listed as the registered agent. Dashonta D Warren LLC also operates, according to LARA, under the assumed name Dashonta D Warren. LARA records show an entity titled

DASHONTA D WARREN #####3741 INC. LTD was registered in the State of Michigan in November 2013 and was dissolved in July 2017 around the same time Dashonta D Warren LLC was formed. Your affiant knows the number #####3741 is the actual social security number assigned to WARREN by the Social Security Administration (SSA). The address associated with DASHONTA D WARREN #####3741 INC LTD is 4000 16th Street in Ecorse, MI.

14. This investigation has also discovered that WARREN applied for numerous PPP loans with U.S. Bank in April of 2020 using the names of supposed entities bearing the full or partial name of Dashonta D. Warren, including Dashonta Warren Living Trust of; Dashonta Warren Business Trust; Dashonta Warren Trust, Dashonta Warren Private Banker Trust; Dashonta Warren Business Trust and Depository Trust Company Clearing. None of these entities, however, is registered in the State of Michigan, according to records maintained by LARA.

15. LARA records indicate a company called Lincoln Park Title Loan LLC was incorporated in the State of Michigan as a Domestic Limited Liability Company (LLC) on March 24, 2020. The registered agent is INDIVIDUAL A with an address in Lincoln Park, Michigan. The registered office mailing address is PO Box 7265, Dearborn, MI 48121. This PO Box is located at the Dearborn Post Office at the 3800 Greenfield Address.¹

¹ This entity name was used by Warren to apply for a PPP loan with US Bank in April 2020

16. According to information received from the Michigan Unemployment Insurance Agency, none of the businesses named in this affidavit ever filed any payroll tax information with the State of Michigan, as required by law, and no wages were reported to the State of Michigan for any employees, for any of the alleged businesses operated by WARREN.

PPP LOAN APPLICATION TO CITIZENS BANK

17. CITIZENS BANK provided documentation it received in support of a PPP loan application for the business DASHONTA D WARREN LLC. Your affiant reviewed the documentation and noted a \$90,000 PPP loan application to Citizens Bank, that included a settlement statement signed by WARREN on April 29, 2020.

18. The PPP loan, SBA Loan #6987917208, was dated April 29, 2020, and \$90,000 was funded to DASHONTA D WARREN LLC's Citizens Bank account X7886. The business address provided was PO BOX 7265, Dearborn, MI 48121.

19. Per review of Citizens Bank account statements for account X7886, your affiant notes \$90,000 was deposited into the account on April 30, 2020. The name listed on the account statement was DASHONTA D WARREN LLC. WARREN then made an \$80,000 withdraw from Citizens Bank account X7886 on May 8, 2020.

20. WARREN also made a net purchase of \$1,349.91 at Enterprise from Citizens Bank account X7886 on May 5, 2020, which appears to have been made directly with the PPP loan proceeds.

21. In support of the PPP application to Citizens Bank, a photograph of a 2018 Form 1099-MISC was submitted. The form indicated the payer was DASHONTA D WARREN, with address of P.O. BOX 7265, Dearborn, Michigan, and account number X7118.

22. Form 1099-MISC (Miscellaneous Income) is an informational return filed with the IRS. A Form 1099-MISC is filed for an individual paid in the course of business or trade, these forms are filed for various types of payments of \$600 or more including rents, prizes and awards, other income, medical and health care payments, and crop insurance proceeds. Box 3 (Other Income) on the Form 1099-MISC is used to report other income that is not reportable in one of the other boxes on the Form 1099-MISC.

23. The Form 1099-MISC provided to Citizens Bank by WARREN shows \$15,000,000 in Box 3 (Other Income) with Dashonta D. Warren as the payer and Parkside Livonia Credit Union JH as the recipient. The Form 1099-MISC provided by Warren also shows \$15,000,000 in Box 4 (Federal Income Tax Withheld) and \$15,000,000 in Box 16 (State Tax Withheld).

24. JH of Parkside Livonia Credit Union was interviewed by a Treasury agent in July 2020. JH recalled Warren and the filing of the Form 1099-MISC because the Credit Union had to dispute the form with the State of Michigan. JH noted the form was completely fictitious in nature. The credit union never paid Warren, nor did it

receive a penny of money, income, other income, or any form of compensation from WARREN or any of his entities.

25. The Form 1099-MISC Warren provided to Citizens Bank is therefore falsely asserting that \$15,000,000 in other income being paid to Parkside Credit Union, with a federal income tax withholding of \$15,000,000 and a state tax withholding of \$15,000,000.

26. JH recalled WARREN issuing the Credit Union “Bank Notes” which were fictitious obligations, that he would try to deposit into his account, which were in the millions of dollars. WARREN would call the branch asking why they had not put the money in his account.

27. On June 25, 2020, employees at CITIZENS BANK provided the following information:

- a. CB noted the bank as a whole made a mistake and WARREN’s PPP loan should not have been approved without receiving additional information.
- b. PJ noted WARREN’s PPP loan in particular did not have the proper payroll records that would have been required. With the PPP program there was a customer attestation that the documents provided could be relied on as valid.
- c. SS noted CITIZENS BANK relied on the tax forms provided by WARREN, including the 1099-MISC described above, in making their

determination to approve WARREN's PPP loan. The documents provided by WARREN were taken at face value and solely used in approving the PPP loan of \$90,000.

28. Further, your Affiant reviewed documents provided by Citizens Bank and observed a Paycheck Protection Program Loan Forgiveness Application was submitted to Citizens Bank. The application was for the business DASHONTA D WARRENLLC with TIN 83-6801205 regarding PPP loan number 6987917208 of PPP loan amount \$90,000. The application asserted the PPP loan proceeds were used as follows: \$80,000 for Payroll Costs, \$2,000 for Business Mortgage Interest Payments, \$6,000.00 Business Rent or Lease Payments, and \$2,000 Business Utility Payments. Application documents were signed by "Dashonta D Warraen LLC" dated September 28, 2020.

29. The bank statements for Citizens Bank X7886 display "Member FDIC". The loan application "Certifications and Authorizations" document indicates the lender was Citizens Bank N.A., located at 1 Citizens Plaza, Providence, Rhode Island 02903. Per the FDIC.gov website, Citizens Bank, National Association at One Citizens Plaza, Providence Rhode Island 02903 was FDIC insured. As such, it appears the lender was an insured depository institution of the Federal Deposit Insurance Act.

PPP LOANAPPLICATIONS TO US BANK

30. On or about April 15, 2020, US Bank received 12 PPP loan applications for a loan amount of approximately \$15.6 million to various businesses allegedly applied for by WARREN. US Bank denied all of the loan applications. A summary follows:

Social	EIN	Individual	Business Name	DOB	Address	Amount Applied for	Application Date
830-63-8910	83-0638910	Dashonta D Warren	DASHONTA WARREN	4/15/1979	3800 Greenfield Road # 7265 Dearborn, MI	\$1,000,000.00	4/15/2020
830-63-8910	82-6391975	Dashonta D Warren	DASHONTA D WARREN	4/15/1979	3800 Greenfield Road # 7265 Dearborn, MI	\$100,000.00	4/15/2020
827-10-6551	82-7106551	Dashonta Warren	DASHONTA WARREN LIVING TRUST OF	4/15/1979	3800 Greenfield Road # 7265 Dearborn, MI	\$5,000,000.00	4/15/2020
836-80-1240	83-6801240	Dashonta Warren	DASHONTA WARREN BUSINESS TRUST	4/15/1979	3800 Greenfield Road # 7265 Dearborn, MI	\$100,000.00	4/15/2020
827-10-8833	82-7108833	Dashonta Warren	DASHONTA WARREN TRUST	4/15/1979	3800 Greenfield Road # 7265 Dearborn, MI	\$4,000,000.00	4/15/2020
836-08-5425	83-6085425	Dashonta Warren	DASHONTA WARREN PRIVATE BANKER TRUST COM	4/15/1979	3800 Greenfield Road # 7265 Dearborn, MI	\$1,000,000.00	4/15/2020
830-62-4724	83-0624724	Dashonta D Warren	DASHONTA D WARREN	4/15/1979	3800 Greenfield Road # 7265 Dearborn, MI	\$100,000.00	4/15/2020
826-37-7656	82-6377656	Dashonta D Warren	DASHONTA D WARREN LIVING TRUST OF	4/15/1979	3800 Greenfield Road # 7265 Dearborn, MI	\$2,000,000.00	4/15/2020
826-37-7627	82-6377627	Dashonta D Warren	DASHONTA D WARREN LIVING TRUST OF	4/15/1979	3800 Greenfield Road # 7265 Dearborn, MI	\$2,000,000.00	4/15/2020
827-13-2646	82-7132646	Dashonta D Warren	DASHONTA D WARREN PRIVATE BANKER TRUST C	4/15/1979	3800 Greenfield Road # 7265 Dearborn, MI	\$100,000.00	4/15/2020
856-13-5064	85-6135064	Dashonta D Warren	LINCOLN PARK TITLE LOAN LLC	4/15/1979	3800 Greenfield Road # 7265 Dearborn, MI	\$100,000.00	4/15/2020
836-80-1205	83-6801205	Dashonta D Warren	DASHONTA D WARREN BUSINESS TRUST AND DEPOSITORY TRUST COMPANY CLEARING	4/15/1979	3800 Greenfield Road # 7265 Dearborn, MI	\$100,000.00	4/15/2020

31. As indicated in the summary above, Warren submitted with his information various information including business name, social security number, and employment identification number (EIN).² A review of records by a Treasury agent determined that all the EINs listed were applied for by Warren and are assigned to the respective entities listed in the summary. All applications listed Warren's address as the 3800 Greenfield address and listed Warren's date of birth as April 15, 1979 which your affiant knows to be Warren's actual date of birth.

EIDL LOAN APPLICATIONS

32. In July 2020, per review of SBA databases, an SBA Special Agent determined that 31 EIDL loan applications were allegedly applied for by WARREN. The loans were applied for by entering a total Gross Revenue of \$46,320,000 and a total Cost of Goods Sold of \$34,190,816 in to the loan application portal. (It is noted, the SBA determines how much EIDL loans should be funded for based off of reported Gross Revenue and Cost of Goods Sold). The SBA denied all of the loan applications. A summary of the loan applications is as follows:

² Note: Warren listed his EIN and SSN as the same number, using the different format for a SSN and EIN

Date of APP	Business Name	EIN	Gross Revenue	Cost of Goods Sold	Address	City	State
4/9/2020	DASHONTA D WARREN	830624724	100,000	100,000	3800 GREENFIELD RD. UNIT#7265	Dearborn	MI
4/9/2020	DASHONTA D WARREN	826391975	1,000,000	1,000,000	GREENFIELD RD. UNIT#7265	Dearborn	MI
4/9/2020	DASHONTA D WARREN	383903741	10,000	10,000	GREENFIELD RD UNIT#7265	Dearborn	MI
4/9/2020	DASHONTA WARREN	827108833	1,000,000	1,000,000	GREENFIELD RD UNIT#7265	Dearborn	MI
4/9/2020	LINCOLN PARK TITLE LOAN LLC	856135064	10,000	10,000	GREENFIELD RD UNIT#7265	Dearborn	MI
4/9/2020	DASHONTA WARREN LIVING TRUST OF	827106551	9,000,000	9,000,000	GREENFIELD RD. UNIT #7265	Dearborn	MI
4/9/2020	DASHONTA WARREN	830638910	100,000	100,000	3800 GREENFIELD RD UNIT#7265	Dearborn	MI
4/9/2020	DASHONTA WARREN PRIVATE BANKER TRUST COMPANY	836085425	1,000,000	1,000,000	GREENFIELD RD. UNIT#7265	Dearborn	MI
4/9/2020	DASHONTA WARREN BUSINESS TRUST	836801240	100,000	100,000	GREENFIELD RD UNIT#7265	Dearborn	MI
4/9/2020	DASHONTA D WARREN PRIVATE BANKER TRUST COMPANY	827132646	1,000,000	1,000,000	GREENFIELD RD. UNIT#7265	Dearborn	MI
4/9/2020	DASHONTA D WARREN BUSINESS TRUST	836801205	1,000,000	1,000,000	GREENFIELD RD UNIT#7265	Dearborn	MI
4/9/2020	DASHONTA D WARREN LIVING TRUST OF	826377656	9,000,000	9,000,000	GREENFIELD RD UNIT#7265	Dearborn	MI
4/9/2020	DASHONTA D WARREN LIVING TRUST OF	826377627	9,000,000	9,000,000	GREENFIELD RD . UNIT#7265	Dearborn	MI

5/4/2020	DASHONTA WARREN	830638910	200,000	20,832	3800 GREENFIELD RD UNIT#7265	Dearborn	MI
5/4/2020	DASHONTA WARREN PRIVATE BANKER TRUST COMPANY	836085425	200,000	20,832	3800 GREENFIELD RD UNIT#7265	Dearborn	MI
5/4/2020	DASHONTA WARREN BUSINESS TRUST	836801240	200,000	20,832	3800 GREENFIELD RD UNIT#7265	Dearborn	MI
5/4/2020	DASHONTA D WARREN PRIVATE BANKER TRUST COMPANY	827132646	200,000	20,832	3800 GREENFIELD RD UNIT#7265	Dearborn	MI
5/4/2020	DASHONTA D WARREN BUSINESS TRUST	836801205	200,000	20,832	3800 GREENFIELD RD UNIT#7265	Dearborn	MI
5/4/2020	DASHONTA D WARREN LIVING TRUST OF	826377627	5,000,000	20,832	3800 GREENFIELD RD UNIT#7265	Dearborn	MI
5/4/2020	DASHONTA D WARREN LIVING TRUST OF	826377656	5,000,000	20,832	3800 GREENFIELD RD UNIT#7265	Dearborn	MI
5/4/2020	GALAXY ATMOSPHERE INC	274348543	500,000	500,000	4000 16TH STREET	Ecorse	MI
5/4/2020	ETERNAL ADVERSITIES OF MOTHERS INC	451596243	500,000	500,000	4000 16TH STREET	Ecorse	MI
5/4/2020	DASHONTA D WARREN383903741 INC LTD	463969402	500,000	500,000	4000 16TH STREET	Ecorse	MI
5/4/2020	DASHONTA WARREN	827108833	200,000	20,832	3800 GREENFIELD RD UNIT#7265	Dearborn	MI
5/4/2020	DASHONTA WARREN LIVING TRUST OF	827106551	200,000	20,832	3800 GREENFIELD RD UNIT#7265	Dearborn	MI
5/4/2020	LINCOLN PARK TITLE LOAN LLC	856135064	200,000	20,832	3800 GREENFIELD RD UNIT#7265	Dearborn	MI
5/4/2020	DASHONTA D WARREN LLC	826391975	200,000	20,832	3800 GREENFIELD RD UNIT#7265	Dearborn	MI

5/4/2020	DASHONTA D WARREN	830624724	200,000	-	3800 GREENFIELD RD UNIT#7265	Dearborn	MI
5/4/2020	DASHONTA D WARREN	383903741	200,000	20,832	3800 GREENFIELD RD UNIT#7265	Dearborn	MI
6/19/2020	DASHONTA D WARREN	383903741	200,000	20,832	3800 GREENFIELD RD UNIT#7265	Dearborn	MI
6/16/2020	DASHONTA D WARREN LLC	830638910	100,000	100,000	3800 GREENFIELD RD UNIT#7265	Dearborn	MI
TOTAL			46,320,000	34,190,816			

CONCLUSION

33. Your affiant submits that there is probable cause to believe that WARREN devised and perpetrated a scheme or artifice to defraud Financial Institutions. In furtherance of and to execute this scheme, WARREN, by means of false or fraudulent pretenses, representations, or promises, obtained moneys, funds, credits, and assets owned by, or under the custody of CITIZENS BANK, a Financial Institution

34. Therefore, your Affiant believes that probable cause exists that DASHONTA WARREN violated 18 U.S.C. §1344 (bank fraud).



MATTHEW SLUSS
Special Agent
Federal Bureau of Investigation

Sworn to before me and signed in my
presence and/or reliable electronic means



Anthony P. Patti February 17, 2021
United States Magistrate Judge
Eastern District of Michigan